



## MEMO ENDORSED

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September 17, 2021

### VIA ECF

The Honorable Kenneth M. Karas  
United States District Court for the Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601-4150

Re: Adrian Rowe, et al v. Old Dominion Freight Line  
Case No. 7:21-cv-04021-KMK (S.D.N.Y.) / Stipulated Extension Request

Your Honor:

The parties have conferred regarding the above-referenced case and write to seek a brief adjournment of the preliminary conference currently scheduled for September 20, 2021 at 10:30 am. A related case, Bowens v. Old Dominion Freight Lines, is currently in state court, with Defendants' response to an amended complaint due by September 28, 2021. Defendant intends to remove Bowens to this Court.

Once removed, the parties may request that the two cases be consolidated. Whether or not they ultimately are, the parties believe it will be most efficient to plan the proceedings in both matters in parallel once they are before this Court. To facilitate that coordination, the parties respectfully request that the Court adjourn the September 20 preliminary conference in this case until after removal of Bowens.

This is the first request for an extension of the preliminary conference and does not affect any other scheduled dates. This request is made in good faith and not for the purpose of causing undue delay.

We thank the Court for its consideration of this request.

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ Brett C. Bartlett

Brett C. Bartlett

BCB/lag

cc: Steven Bennett Blaue (via ECF)

*Granted. The Court will hold a teleconference on  
October 27, 2021 at 10:00 AM*

SO ORDERED

  
KENNETH M. KARAS U.S.D.J.

*9/17/2021*